

Exhibit B

OGM's Refusal to Respond to Bethany Christian

<u>Date</u>	<u>Content of Communication</u>	<u>OGM's Response</u>
January 5, 2024	Bethany Christian sends detailed, 10-page letter describing its policies and practices, and explaining Bethany Christian's compliance with constitutional and legal standards <i>Exhibit N to Verified Complaint</i>	No response
July 12, 2024	Bethany Christian requests clarification regarding new contract language in RFP	No response
July 16, 2024	Bethany Christian again requests clarification via email on new contract language and whether the "employment and hiring practices" Bethany Christian described in its "January 2024 response" would be "allowed under the non-discrimination and diversity, equity, and inclusion requirements," and "[i]f not . . . what changes would be necessary to Bethany Christian's practices to comply with the non-discrimination and diversity, equity, and inclusion requirements" <i>Exhibit O to Verified Complaint</i>	"In fairness to other bidders, the OGM cannot provide insight into an appropriate or acceptable response to the RFP proposal." <i>Exhibit P to Verified Complaint</i>
July 19, 2024	Bethany Christian submits an attachment to its responses with proposed contract-language changes <i>Exhibit Q to Verified Complaint</i>	No substantive response from OGM

July 26, 2024	Bethany Christian submits RFP with Proposal for Changes to Contract Terms	No response
July 31, 2024	Bethany Christian submits RFP with Proposal for Changes to Contract Terms	No response
August 7, 2024	Bethany Christian asks for clarification and amendment of new contract language containing religion focused language (URM contracts), seeking “a transparent conversation with OGM to ensure that we can work together in a manner that ensures the highest standard of service to the newcomer populations” <i>Exhibit T to Verified Complaint</i>	No response
August 22, 2024	Bethany Christian follows up on August 7 request <i>Exhibit U to Verified Complaint</i>	No response except acknowledgment of receipt of email <i>Exhibit U to Verified Complaint</i>
August 27, 2024	Bethany Christian’s general counsel requests meeting with OGM and Sias Hernandez “to have an open discussion to clear any misperceptions and resolve any disagreements” <i>Exhibit V to Verified Complaint</i>	No response from OGM or Sias Hernandez
August 27, 2024	Bethany Christian sends appeal for denial of RFP for Grand Rapids	No response to appeal, nor an acknowledgment that appeal had been received
August 27, 2024	Bethany Christian appeals OGM’s decision to deny Supplemental Services Contracts in Kalamazoo <i>Exhibit R to Verified Complaint</i>	No response to appeal, nor an acknowledgment that appeal had been received
August 29, 2024	Bethany Christian follows up on August 7 request again, and offers in-person meeting again	No response to request

	<i>Exhibit U to Verified Complaint</i>	
August 30, 2024	Bethany Christian submits RFP for Refugee Health Promotion with Proposal for Changes to Contract terms	No response
September 6, 2024	Bethany Christian sends follow up email inquiring about status of appeal, “kindly request[ing] a formal response outlining the next steps of the appeal process” and raising concerns with “the legality of moving forward . . . without first receiving a final decision” and noting that “moving forward with the transition at this stage could lead to significant disruption in services for the vulnerable refugee populations we serve and unnecessary displacement of staff” <i>Exhibit S to Verified Complaint</i>	Acknowledgment of receipt, but no substantive response